

JUDGE KAPLAN
Michael J. Frevola

Christopher R. Nolan
HOLLAND & KNIGHT LLP
195 Broadway
New York, NY 10007-3189
(212) 513-3200

08 CV 03343

ATTORNEYS FOR PLAINTIFF
INGOSSTRAKH JOINT STOCK INSURANCE
COMPANY LIMITED OF RUSSIA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INGOSSTRAKH JOINT STOCK INSURANCE
COMPANY LIMITED OF RUSSIA,

Plaintiff,

-against-

WUXI ANTAI POWER MACHINERY CO. LTD.,

Defendant.

08 Civ. _____

**AFFIDAVIT IN
SUPPORT OF ATTACHMENT**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Michael J. Frevola, being duly sworn, deposes and says:

1. I am a member of the firm of Holland & Knight LLP, attorneys for plaintiff Ingosstrakh Joint Stock Insurance Company Limited of Russia ("Plaintiff"), and I am duly admitted to practice before the United States District Court for the Southern District of New York. I am fully familiar with all the facts in the above case.

2. I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Verified Complaint and the Write of Attachment.

3. Defendant Wuxi Antai Power Machinery Co. Ltd. ("Wuxi Antai") is not listed in the telephone directory of the principal metropolitan areas in the district, nor is it listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4. Our office contacted the Secretary of State for the State of New York and was advised that Wuxi Antai is neither a New York business entity, nor was it a foreign business entity authorized to do business in New York.

5. To the best of my information and belief, Wuxi Antai cannot be found within this district or within the State of New York.

6. Based upon the facts set forth in the Verified Complaint, I respectfully submit that the Defendant Wuxi Antai is liable to Plaintiff for the damages alleged in the Verified Complaint, which amounts, as best as can be presently determined, to a total of US\$714,177.50, including estimated interest, expenses and attorneys' fees.

7. Upon information and belief, Wuxi Antai has property, goods, chattels or effects within this jurisdiction, to wit: funds or accounts held in the name of Wuxi Antai Power Machinery Co. Ltd. at one or more of the following financial institutions:

Bank of America, N.A.

Bank of China

The Bank of New York

Citibank, N.A.

Deutsche Bank Trust Company Americas

HSBC Bank USA, N.A.

JPMorgan Chase Bank, N.A.

UBS AG

Wachovia Bank, N.A.

Société Générale

Standard Chartered Bank

BNP Paribas

Calyon Investment Bank

American Express Bank

Commerzbank

ABN Amro Bank

Bank Leumi USA

Banco Popular

China Trust Bank

Bank of Tokyo-Mitsubishi UFJ Ltd.

Industrial Bank of Korea

Shin Han Bank

Great Eastern Bank

Nara Bank

United Orient Bank

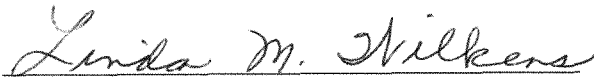
8. Plaintiff is, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue a writ of maritime attachment for an amount up to \$714,177.50.

WHEREFORE, Plaintiff respectfully requests that the application for a writ of maritime attachment and garnishment be granted.



Michael J. Frevola

Sworn to before me this
3rd day of April, 2008


Notary Public

5243938_v1

Linda M. Wilkens
Notary Public, State of New York
No. 01W19672455
Qualified in Queens County
Certificate filed in New York County
Commission Expires September 30, 2010 _____